

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ENTESAR OSMAN KASHEF, *et al.*,

Plaintiffs,

v.

BNP PARIBAS S.A., and BNP PARIBAS US
WHOLESALE HOLDINGS, CORP. (f/k/a
BNP PARIBAS NORTH AMERICA, INC.),

Defendants.

No. 1:16-cv-03228-AKH

Hon. Alvin K. Hellerstein

SECOND REVISED ORDER APPROVING PROPOSED NOTICE PLAN

Upon consideration of the Revised Declaration of Cameron R. Azari Regarding Revised Notice Plan, dated January 2, 2025, and its Attachment A (the “Revised Notice Plan”) as well as Exhibits 1-7 thereto (together “Epiq’s Notice Plan,” dated January 2, 2025), **IT IS HEREBY ORDERED** that Epiq’s Revised Notice Plan is **APPROVED**.

The Court finds that Epiq’s Notice Plan satisfies the requirements of Federal Rule of Civil Procedure 23(c)(2) and due process and constitutes the best notice practicable under the circumstances.

IT IS FURTHER ORDERED that:

1. The certified Class (ECF No. 581) shall receive direct and indirect notice in accordance with the terms of this Order.
2. The Court approves, as to form and content, the notice forms attached as Exhibits 1-7 to the Notice Program. All Notice Forms will be translated into Sudanese Arabic and will be made available to class members in English and Sudanese Arabic. In the event that Sudanese Arabic translations of character-restricted notice messages (such as text messages) require in kind changes to the English versions, Class Counsel and Epiq,

together with Defendants, shall submit for Court approval any proposed replacements for same.

3. Epiq Class Action and Claims Solutions, Inc. ("Epiq"), the court-appointed notice administrator (ECF No. 593), shall disseminate notice to the class in the manner set forth in Epiq's Notice Plan beginning ^{on or before} February 10, 2025; specifically:

- a. Epiq shall cause individual notice to be disseminated to the Class Members that have been identified in the records maintained by Epiq via first class mail (Exhibit 1)¹, via email (Exhibit 2), and/or via text message (Exhibit 3) (together, the "Direct Notice") beginning ^{on or before} February 10, 2025;
- b. Epiq shall cause notice to be published on the media set forth in Epiq's Notice Plan, including on online display banners, social media, internet sponsored searches, streaming/connected TV, and the information release (Exhibits 4-6) beginning ^{on or before} February 10, 2025 (together, the "Publication Notice");
- c. On or before February 10, 2025, Epiq shall post the Summary and Long Form Notices (Exhibits 1 and 7), as well as the opt-in or opt-out form and questionnaire, to the case-specific website, www.kashefvpnpp.com, which is listed on all Notice Forms.

4. On January 15, 2025, Epiq will file with the Court its First Monthly Status Report and thereafter will file a Report on or about every 10th business day of every month. On February 1, 2025, Epiq will file with the Court a Notice Commencement Declaration, attesting that Notice has begun, as ordered, and on July 17, 2025, Epiq will file a


¹ All references to exhibits herein are references to the exhibits to the Attachment A, the Notice Program, to the January 2, 2025 Revised Declaration of Cameron R. Azari Regarding Revised Notice Plan.

Supplemental Implementation Declaration which will include a final Opt-Out and Opt-In Report.

5. A class member may request to be excluded from the litigation by submitting an opt-out form before midnight ET on July 1, 2025.
6. A class member may request to pursue compensation for individual damages and losses by submitting an opt-in form and an accompanying questionnaire, signed under oath, before midnight ET on July 1, 2025.

THE PARTIES HAVING APPROVED, IT IS SO ORDERED.

Dated: Jan 13, 2025


Hon. Alvin K. Hellerstein
United States District Judge